

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)

) Chapter 11

)

) Case No. 23-11069 (CTG)

)

) (Jointly Administered)

)

) **Re: Docket No. 608**

**ORDER APPROVING THE JOINT STIPULATION
BY AND AMONG THE DEBTORS AND GARY W. GIBBY TO (I) EXTEND THE
DEADLINE TO RESPOND TO OMNIBUS OBJECTIONS TO MOTION TO LIFT THE
AUTOMATIC STAY AND
(II) EXTEND THE HEARING DATE RELATED THERETO**

Upon the *Certification of Counsel Regarding the Joint Stipulation By and Among the Debtors and Gary W. Gibby to (I) Extend the Deadline to Respond to Omnibus Objections to Motion to Lift the Automatic Stay and (II) Extend the Hearing Date Related Thereto* (the “Certification of Counsel”) and the *Joint Stipulation By and Among the Debtors and Gary W. Gibby to (I) Extend the Deadline to Respond to Omnibus Objections to Motion to Lift the Automatic Stay and (II) Extend the Hearing Date Related Thereto* (the “Stipulation”),² by and between the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and Gary W. Gibby (the “Movant,” and together with the Debtors, the “Parties”), attached to this order (this “Order”) as **Exhibit 1**; and the district court having jurisdiction under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Stipulation in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Stipulation; and this Court having determined that the legal and factual bases set forth in the Stipulation establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Stipulation is approved.
2. The Stipulation shall be effective immediately upon entry of this Order.
3. The Hearing Date for the Motion is **November 13, 2023 at 10:00 a.m. (ET)**, or such other date as may be suitable for the Court's docket.
4. The deadline for Movant to respond to the Omnibus Objections is extended through and including **November 8, 2023 at 4:00 p.m. (ET)**.
5. The entry of this Stipulation and Order is without prejudice to any other party's right to respond to the Motion.
6. The Parties may mutually agree to further extensions of the response deadline and/or hearing date via email or by noting such extensions on the applicable hearing agenda.
7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order and to consummate the Stipulation.
8. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order and the Stipulation.

Exhibit 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

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Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

Re: Docket No. 608

JOINT STIPULATION

**BY AND AMONG THE DEBTORS AND GARY W. GIBBY TO (I) EXTEND THE
DEADLINE TO RESPOND TO OMNIBUS OBJECTIONS TO MOTION TO LIFT THE
AUTOMATIC STAY AND
(II) EXTEND THE HEARING DATE RELATED THERETO**

This joint stipulation (“Stipulation”) is made and entered into by and among (a) the above-captioned debtors and debtors in possession (the “Debtors”)² and (c) Gary W. Gibby (the “Movant,” and together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS, on August 6, 2023 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. These chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b) [Docket No. 169]. The Debtors are managing their businesses and their

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to the Debtors’ chapter 11 cases, is set forth in the *Declaration of Matthew A. Doheny, Chief Restructuring Officer of Yellow Corporation, in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Docket No. 14] (the “First Day Declaration”).

properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On August 16, 2023, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors [Docket No. 269] (the “Committee”). No trustee or examiner has been appointed in these chapter 11 cases;

WHEREAS, on September 19, 2023, the Movant filed the *Motion for Relief from the Automatic Stay* [D.I. 608] (the “Motion”),¹ pursuant to which the deadline for filing a response was set for October 3, 2023 at 4:00 p.m. (ET) (the “Response Deadline”) and the hearing date for the Motion was set for October 23, 2023 at 10:00 a.m. (ET) (“Hearing Date”);

WHEREAS, on October 2, 2023, undersigned counsel and counsel for the Debtors filed a *Certification of Counsel Regarding Joint Stipulation By and Among the Debtors and Gary W. Gibby to (I) Extend the Deadline to Respond to Motion to Lift the Automatic Stay and (II) Extend the Hearing Date Related Thereto* (“First Joint Stipulation”) to extend the Response Deadline to October 12, 2023 at 4:00 pm (ET) [D.I. 739].

WHEREAS, on October 3, 2023, the Court enter an order approving the First Joint Stipulation and extended the Response Deadline to October 12, 2023 at 4:00 pm (ET) (“Amended Response Deadline”) [D.I. 747].

WHEREAS, on October 12, 2023, Debtors filed *Debtors’ Omnibus Objection to Personal Injury Claimants’ Motion for Relief from the Automatic Stay Under Section 362 of the Bankruptcy Code* [D.I. 827] (“Debtors’ Objection”);

WHEREAS, on October 12, 2023, ORIC filed the *Omnibus Objection and Reservation of Rights of Creditor Old republic Insurance Company top Motions for Relief from the Automatic*

¹ Capitalized terms used but not immediately defined have the meanings given to them in the Motion.

Stay to the Extent of Insurance Proceeds [D.I. 823] (“ORIC’s Objection” and together with Debtors’ Objection, the “Omnibus Objections”);

WHEREAS, the Parties have conferred and agreed to adjourn the Hearing Date to November 13, 2023 at 10:00 a.m. (ET), or such other date as may be suitable for the Court’s docket;

WHEREAS, the Parties have conferred and agreed to extend the deadline for Movant to respond to the Omnibus Objections to November 8, 2023 at 4:00 p.m. (ET); and

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED as follows:

1. The above recitals are incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.
2. The Hearing Date for the Motion is **November 13, 2023 at 10:00 a.m. (ET)**, or such other date as may be suitable for the Court’s docket.
3. The deadline for Movant to respond to the Omnibus Objections is extended through and including **November 8, 2023 at 4:00 p.m. (ET)**.
4. The Parties may mutually agree to further extensions of the response deadline and/or hearing date via email or by noting such extensions on the applicable hearing agenda.
5. Each of the Parties to this Stipulation represents and warrants it is duly authorized to enter into and be bound by this Stipulation.
6. This Stipulation is subject to the approval of the Court and shall be effective upon entry of an order approving this Stipulation by the Court (the “Order”). The Parties hereby consent to the entry of the Order and waive any right to notice or hearing on the approval of the Stipulation.

7. The Court retains exclusive jurisdiction with respect to any disputes arising from or other actions to interpret, administer, or enforce the terms and provisions of this Stipulation and the Order.

Dated: October 19, 2023
Wilmington, Delaware

/s/ Peter J. Keane

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